

# UNITED STATES DISTRICT COURT

for the

Western District of Michigan ☒

JEFFREY RYAN FENTON

*Plaintiff(s)*

v.

VIRGINIA LEE STORY et al.,

*Defendant(s)*

**FILED - LN**

October 21, 2024 4:17 PM

CLERK OF COURT

U.S. DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

BY: pjw / SCANNED BY: 10/24/24

Civil Action No. 1:23-cv-1097

## SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* Sandra Jane Leach Garrett  
2021 Hunterwood Drive  
Brentwood, TN 37027

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Jeffrey Fenton  
17195 Silver Parkway #150  
Fenton, MI 48430

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

AUG 19 2024

Date: 5/23/2024

CLERK OF COURT

*Paula J. Wood*  
Signature of Clerk or Deputy Clerk

Civil Action No. 1:23-cv-1097

## PROOF OF SERVICE

*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for (name of individual and title, if any)

SANDRA JANE LEACH GARRETT

was received by me on (date)

August 21, 2024

☒ Other (specify):

Service of defendant SANDRA JANE LEACH GARRETT was initiated on August 23, 2024, pursuant to F.R.Civ.P. 4(e)(1) and Mich. Ct. R. 2.105(A) by delivering to her the lawsuit service package as itemized in ECF 69 and 69-1 of this lawsuit, via certified U.S. mail with tracking number 70203160000230014797, return receipt requested, with delivery restricted to the addressee.

On August 26 the USPS reported, "Notice Left (No Authorized Recipient Available)", after which they attempted to deliver again on August 31, but were unsuccessful. Research of this case by the Linden Michigan Postmaster shows that this parcel is still *waiting* to be *picked-up* at the Post Office in Brentwood, Tennessee, over *six-weeks* after the initial delivery attempt, but to date defendant Garrett has neglected or refused to do so.

On September 4, 2024, a second lawsuit service package as itemized in ECF 69 and 69-1 of this lawsuit, was sent to defendant SANDRA JANE LEACH GARRETT, this time at her place of employment, via certified U.S. mail with tracking number 70203160000230017163, return receipt requested.

Since defendant Garrett is employed by a government entity, restricted delivery was not used this time, because it was unknown whether or not the mail carrier would have direct access to her. This package was delivered on September 9, 2024, at 1:01 PM and signed for by what looks like "Lani White".

Due to concerns about the overall evasiveness exhibited by *many* of the defendants in this lawsuit, while defendant Garrett's personal service of this lawsuit to her residence remained *unclaimed*, a third serve attempt of this lawsuit service package as itemized in ECF 69 and 69-1 of this lawsuit was sent to defendant SANDRA JANE LEACH GARRETT, this time at her place of employment again, but using *restricted delivery*, to ensure that the personal service requirements were fully satisfied. The certified U.S. mail tracking number this time was 70202450000036716232, with a return receipt again requested.

This package was successfully delivered on September 20, 2024, at 11:30 AM, and was signed for by an individual named "Molly Leins". Once again, somehow this parcel was received by someone *other* than the *addressee* clearly named, despite the package having been specifically sent with *restricted delivery*.

Brian Joseph Gallagher of Lennon Miller PLC made an appearance in this matter on behalf of defendant Garrett on September 17, 2024, with that then becoming the *deemed date of service* for defendant Garrett.

"(3) An action shall not be dismissed for improper service of process unless the service failed to *inform* the defendant of the action within the time provided in these rules for service." Rule 2.105(K)(3) - Process; Manner of Service, Mich. Ct. R. 2.105(K)(3).

In the spirit of Mich. Ct. R. 2.105(K)(3) above, the objective here was to err on the side of caution while completing service, since clearly the defendant must have been *informed* about this action prior to the *date of first appearance* of her counsel evidenced in the record.

I declare under penalty of perjury that this information is true.

Date: 10/19/2024Marsha Ann Fenton

Server's signature

Marsha Ann Fenton

Printed name and title

17195 Silver Pkwy, #150, Fenton, MI 48430-3426

Server's address





LINDEN  
215 S MAIN ST  
LINDEN, MI 48451-9998  
(800)275-8777

09/18/2024 09:10 AM

Product	Qty	Unit Price	Price
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Priority Mail®	1		\$14.25
Brentwood, TN 37027			
Weight: 3 lb 14.90 oz			
Expected Delivery Date			
Fri 09/20/2024			
Insurance			\$0.00
Up to \$100.00 included			
Restricted Del			\$12.75
Recipient name			
SANDRA J GARRETT			
Tracking #:			
70202450000036716232			
Return Receipt			\$4.10
Tracking #:			
9590 9402 8627 3244 0676 12			
Total			\$31.10

Grand Total: \$142.60

Credit Card Remit \$142.60

Card Name: VISA  
Account #: XXXXXXXXXX8359  
Approval #: 808101  
Transaction #: 341  
AID: A0000000031010 Chip  
AL: VISA CREDIT  
PIN: Not Required

UFN: 255460-0451  
Receipt #: 840-54930036-3-6780830-2  
Clerk: 06

U.S. Postal Service™  
**CERTIFIED MAIL® RECEIPT**  
Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Brentwood, TN 37027

**OFFICIAL USE**

Certified Mail Fee \$14.25  
Extra Services & Fees (check box, add fee as appropriate)  
☒ Return Receipt (hardcopy) \$12.75  
☐ Return Receipt (electronic)  
☒ Certified Mail Restricted Delivery \$0.00  
☐ Adult Signature Required \$0.00  
☐ Adult Signature Restricted Delivery \$0.00  
Postage \$14.25  
Total Postage and Fees \$431.10

Postmark Here  
SEP 18 2024  
09/18/2024

**SANDRA GARRETT**  
**10 CADILLAC DR STE 220**  
**BRENTWOOD, TN 37027-5078**

Instructions

USPS TRACKING#

NASHVILLE TN 370

20 SEP 2024 PM 6 L

9590 9402 8627 3244 0676 12

United States Postal Service

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box•

**17195 SILVER PKWY**  
**PMB #150**  
**FENTON, MI 48430-3426**

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**SANDRA GARRETT**  
**10 CADILLAC DR STE 220**  
**BRENTWOOD, TN 37027-5078**



9590 9402 8627 3244 0676 12

Article Number (Transfer from address label)  
7020 2450 0000 3671 6232

PS Form 3811, July 2020 PSN 7530-02-000-9053

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature

X Molly Davis

☐ Agent  
☐ Addressee

B. Received by (Printed Name)

Molly Davis

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☐ Adult Signature  
☐ Adult Signature Restricted Delivery  
☐ Certified Mail®  
☒ Certified Mail Restricted Delivery  
☐ Collect on Delivery  
☐ Collect on Delivery Restricted Delivery  
☐ Insured Mail  
☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®  
☐ Registered Mail™  
☐ Registered Mail Restricted Delivery  
☐ Signature Confirmation™  
☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt

ALERT: HURRICANE HELENE, FLOODING, AND SEVERE WEATHER IN THE SOUTHEASTER...

USPS Tracking<sup>®</sup>

COMPLETED

FAQs >

Tracking Number:

Remove X

70202450000036716232

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered to the front desk, reception area, or mail room at 11:30 am on September 20, 2024 in BRENTWOOD, TN 37027.

Get More Out of USPS Tracking:  
USPS Tracking Plus<sup>®</sup>

**Delivered**  
Delivered, Front Desk/Reception/Mail Room  
BRENTWOOD, TN 37027  
September 20, 2024, 11:30 am

**Out for Delivery**  
BRENTWOOD, TN 37027  
September 20, 2024, 7:21 am

**Arrived at Post Office**  
BRENTWOOD, TN 37027  
September 20, 2024, 7:10 am

**Arrived at USPS Regional Destination Facility**  
NASHVILLE TN DISTRIBUTION CENTER  
September 19, 2024, 8:28 pm

Feedback

**In Transit to Next Facility**  
September 19, 2024

**Arrived at USPS Regional Origin Facility**  
DETROIT MI DISTRIBUTION CENTER  
September 18, 2024, 8:16 pm

**Departed Post Office**  
LINDEN, MI 48451  
September 18, 2024, 4:02 pm

**USPS in possession of item**  
LINDEN, MI 48451  
September 18, 2024, 9:09 am

Hide Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates

USPS Tracking Plus®

Product Information

Feedback

Postal Product: Priority Mail®

Features: Certified Mail Restricted Delivery  
Up to \$100 insurance included. Restrictions Apply ⓘ

See tracking for related item:  
9590940286273244067612 (/go/TrackConfirmAction?tLabels=9590940286273244067612)

See Less ^

Track Another Package

Enter tracking or barcode numbers



ALERT: HURRICANE HELENE, FLOODING, AND SEVERE WEATHER IN THE SOUTHEASTER...

USPS Tracking®

FAQs >

COMPLETED

Tracking Number:

Remove X

9590940286273244067612

Copy Add to Informed Delivery (https://informedelivery.usps.com/)

Latest Update

Your item was delivered in or at the mailbox at 2:40 pm on September 23, 2024 in FENTON, MI 48430.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Feedback

Delivered

Delivered, In/At Mailbox

FENTON, MI 48430  
September 23, 2024, 2:40 pm

Arrived at USPS Regional Destination Facility

PONTIAC MI DISTRIBUTION CENTER  
September 22, 2024, 11:11 am

Arrived at USPS Regional Origin Facility

NASHVILLE TN DISTRIBUTION CENTER  
September 20, 2024, 7:57 pm

USPS picked up item

BRENTWOOD, TN 37027  
September 20, 2024, 11:31 am

Return Receipt Associated

September 18, 2024, 9:09 am



LINDEN  
215 S MAIN ST  
LINDEN, MI 48451-9998  
(800)275-8777

09/04/2024 10:06 AM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$14.25
Brentwood, TN 37027			
Weight: 3 lb 11.90 oz			
Expected Delivery Date			
Fri 09/06/2024			
Insurance			\$0.00
Up to \$100.00 included			
Certified Mail®			\$4.85
Tracking #:			
→ 70203160000230017163			
Return Receipt			\$4.10
Tracking #:			
9590 9402 8627 3244 0677 59			
<b>Total</b>			<b>\$23.20</b>

Grand Total: \$72.30

Credit Card Remit \$72.30

Card Name: VISA  
Account #: XXXXXXXXXXXXX8359  
Approval #: 904060  
Transaction #: 237  
AID: A0000000031010 Chip  
AL: VISA CREDIT  
PIN: Not Required

UFN: 255460-0451  
Receipt #: 840-54930036-3-6764485-2  
Clerk: 06

# U.S. Postal Service™ CERTIFIED MAIL® RECEIPT Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com).

Brentwood, TN 37027

Certified Mail Fee \$14.25

\$4.10

09/04/2024

Extra Services & Fees (check box, add fee as appropriate)

☒ Return Receipt (hardcopy) \$0.00

☐ Return Receipt (electronic) \$0.00

☐ Certified Mail Restricted Delivery \$0.00

☒ Adult Signature Required \$0.00

☐ Adult Signature Restricted Delivery \$0.00

Postage \$14.25

Total Postage and Fees \$23.20

Postmark

Here

SEP 04 2024

09/04/2024

LINDEN

BOARD OF PROFESSIONAL RESPONSIBILITY

SANDRA GARRETT, EXECUTIVE DIRECTOR

10 CADILLAC DR STE 220

BRENTWOOD, TN 37027-5078

Instructions

USPS TRACKING #



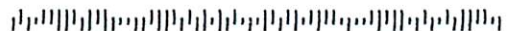
9590 9402 8627 3244 0677 59

United States  
Postal Service

First-Class Mail  
Postage & Fees Paid  
USPS  
Permit No. G-10

\* Sender: Please print your name, address, and ZIP+4® in this box \*

**17195 SILVER PKWY**  
**PMB #150**  
**FENTON, MI 48430-3426**



## SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

BOARD OF PROFESSIONAL RESPONSIBILITY  
SANDRA GARRETT, EXECUTIVE DIRECTOR  
10 CADILLAC DR STE 220  
BRENTWOOD, TN 37027-5078



9590 9402 8627 3244 0677 59

Article Number (Transfer from sender label)

7020 3160 0002 3001 7163

PS Form 3811, July 2020 PSN 7530-02-000-9053

## COMPLETE THIS SECTION ON DELIVERY

A. Signature

☒ Agent ☐ Addressee

B. Received by (Printed Name)

Lani White

C. Date of Delivery

D. Is delivery address different from item 1? ☐ Yes  
If YES, enter delivery address below: ☐ No

3. Service Type

☒ Adult Signature

☐ Adult Signature Restricted Delivery

☒ Certified Mail®

☐ Certified Mail Restricted Delivery

☐ Collect on Delivery

☐ Collect on Delivery Restricted Delivery

☐ Insured Mail

☐ Insured Mail Restricted Delivery (over \$500)

☐ Priority Mail Express®

☐ Registered Mail™

☐ Registered Mail Restricted Delivery

☐ Signature Confirmation™

☐ Signature Confirmation Restricted Delivery

Domestic Return Receipt



ALERT: TROPICAL STORM FRANCINE, FLOODING, AND SEVERE WEATHER IN THE SOUTHERN U.S. M...

USPS Tracking®

FAQs >

COMPLETED

Tracking Number:

Remove X

70203160000230017163

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

### Latest Update

Your item was delivered to the front desk, reception area, or mail room at 1:01 pm on September 9, 2024 in BRENTWOOD, TN 37027.

Get More Out of USPS Tracking:

USPS Tracking Plus®

#### Delivered

Delivered, Front Desk/Reception/Mail Room

BRENTWOOD, TN 37027

September 9, 2024, 1:01 pm

#### Redelivery Scheduled for Next Business Day

BRENTWOOD, TN 37027

September 7, 2024, 11:08 am

#### Out for Delivery

BRENTWOOD, TN 37027

September 7, 2024, 8:23 am

#### Arrived at Post Office

BRENTWOOD, TN 37027

September 7, 2024, 8:12 am

#### Arrived at USPS Regional Destination Facility

NASHVILLE TN DISTRIBUTION CENTER

September 6, 2024, 10:04 pm

#### In Transit to Next Facility

September 6, 2024

Feedback



**Arrived at USPS Regional Origin Facility**  
DETROIT MI DISTRIBUTION CENTER  
September 5, 2024, 12:08 pm

**Departed Post Office**  
LINDEN, MI 48451  
September 4, 2024, 4:02 pm

**USPS in possession of item**  
LINDEN, MI 48451  
September 4, 2024, 10:02 am

Hide Tracking History

What Do USPS Tracking Statuses Mean? (<https://faq.usps.com/s/article/Where-is-my-package>)

Text & Email Updates

USPS Tracking Plus®

Product Information

Postal

Product:

Priority Mail®

Features:

Certified Mail™

Up to \$100 insurance included. Restrictions Apply ⓘ

See tracking for related item:  
[9590940286273244067759 \(/go/TrackConfirmAction?tLabels=9590940286273244067759\)](#)

Feedback

See Less ^

Track Another Package

Enter tracking or barcode numbers

Need More Help?

Contact USPS Tracking support for further assistance.

FAQs

USPS Tracking®

FAQs >

COMPLETED

Tracking Number:

9590940286273244067759

Remove X

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

Latest Update

Your item was delivered in or at the mailbox at 1:59 pm on September 12, 2024 in FENTON, MI 48430.

Get More Out of USPS Tracking:

USPS Tracking Plus®

Delivered

Delivered, In/At Mailbox

FENTON, MI 48430

September 12, 2024, 1:59 pm

Arrived at USPS Regional Destination Facility

PONTIAC MI DISTRIBUTION CENTER

September 11, 2024, 11:24 am

Arrived at USPS Regional Origin Facility

NASHVILLE TN DISTRIBUTION CENTER

September 9, 2024, 9:49 pm

USPS picked up item

BRENTWOOD, TN 37027

September 9, 2024, 1:02 pm

Return Receipt Associated

September 4, 2024, 10:02 am

Hide Tracking History

Feedback




**UNITED STATES  
POSTAL SERVICE.**

LINDEN  
215 S MAIN ST  
LINDEN, MI 48451-9998  
(800) 275-8777

08/23/2024 04:29 PM

Product	Qty	Unit Price	Price
Priority Mail®	1		\$14.25
Brentwood, TN 37027			
Weight: 3 lb 10.20 oz			
Expected Delivery Date			
Mon 08/26/2024			
Insurance			\$0.00
Up to \$100.00 included			
Restricted Del			\$12.75
Recipient name			
SANDRA GARRETT			
Tracking #: 70203160000230014797			
Return Receipt			\$4.10
Tracking #: 9590 9402 8627 3244 0684 04			
Total			\$31.10
Grand Total: \$62.20			
Credit Card Remit \$62.20			
Card Name: VISA			
Account #: XXXXXXXXXXXX8359			
Approval #: 513292			
Transaction #: 665			
AID: A0000000031010 Chip			
AL: VISA CREDIT			
PIN: Not Required			

UFN: 255460-0451  
Receipt #: 840-54930036-1-5522121-2  
Clerk: 6

**U.S. Postal Service™**  
**CERTIFIED MAIL® RECEIPT**  
 Domestic Mail Only

For delivery information, visit our website at [www.usps.com](http://www.usps.com)®.

Brentwood, TN 37027

LINDEN, MI 48451

Postmark  
Here  
AUG 23 2024

USPS

**SANDRA GARRETT**  
**2021 HUNTERWOOD DR**  
**BRENTWOOD, TN 37027-5421**

REFUSED

ALERT: HURRICANES HELENE AND MILTON, FLOODING, AND SEVERE WEATHER IN NORT...

USPS Tracking®

FAQs >

**UNCLAIMED—REFUSED**

Tracking Number:

Remove X

**70203160000230014797**

Copy

Add to Informed Delivery (<https://informedelivery.usps.com/>)

### Latest Update

This is a reminder to arrange for redelivery of your item or your item will be returned to sender.

Get More Out of USPS Tracking:

USPS Tracking Plus®

**WAITING OVER SIX-WEEKS  
TO BE PICKED-UP**

Feedback

#### Delivery Attempt

Reminder to Schedule Redelivery of your item

August 31, 2024

#### Notice Left (No Authorized Recipient Available)

BRENTWOOD, TN 37027

August 26, 2024, 12:27 pm

#### Out for Delivery

BRENTWOOD, TN 37027

August 26, 2024, 6:23 am

#### Arrived at Post Office

BRENTWOOD, TN 37027

August 26, 2024, 6:12 am

#### In Transit to Next Facility

August 25, 2024

#### Arrived at USPS Regional Destination Facility

10/19/2024, 6:31 PM



NASHVILLE TN DISTRIBUTION CENTER  
August 24, 2024, 6:17 pm

**Arrived at USPS Regional Origin Facility**  
DETROIT MI DISTRIBUTION CENTER  
August 24, 2024, 1:09 am

**Arrived at USPS Regional Facility**  
PONTIAC MI DISTRIBUTION CENTER  
August 23, 2024, 11:19 pm

**Departed USPS Facility**  
LINDEN, MI 48451  
August 23, 2024, 5:04 pm

**Departed Post Office**  
LINDEN, MI 48451  
August 23, 2024, 5:02 pm

**USPS in possession of item**  
LINDEN, MI 48451  
August 23, 2024, 4:24 pm

Hide Tracking History

Feedback

[What Do USPS Tracking Statuses Mean? \(https://faq.usps.com/s/article/Where-is-my-package\)](https://faq.usps.com/s/article/Where-is-my-package)

- Text & Email Updates
- USPS Tracking Plus®
- Product Information

Postal Product: Priority Mail®

Features: Certified Mail Restricted Delivery  
Up to \$100 insurance included. Restrictions Apply ⓘ

See tracking for related item:  
9590940286273244068404 (/go/TrackConfirmAction?tLabels=9590940286273244068404)

See Less ^